

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Kelly Andrade,

Plaintiff,

v.

**Cultural Care, Inc., Michael Esposito, and
Danielle Esposito,**

Defendants.

Civil Action No. 21-CV-5237

Hon. William F. Kuntz, II

ORAL ARGUMENT REQUESTED

Date of Service: December 10, 2024

**NOTICE OF MOTION FOR REMITTITUR, OR IN THE ALTERNATIVE,
MOTION FOR NEW TRIAL ON THE ISSUE OF DAMAGES**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Motion for Remittitur, or in the Alternative, Motion for New Trial on the Issue of Damages, dated December 10, 2024, and upon the trial exhibits, testimony, and Declaration of Michael Esposito cited and referenced therein, Defendants Michael Esposito and Danielle Esposito (the “Espositos” or “Defendants”), through their undersigned attorneys, will move this Court, before the Honorable William F. Kuntz, II, at the Eastern District of New York Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, at a date and time to be determined by the court, for an under, pursuant to Fed. R. Civ. P. 59 for remittitur of compensatory and punitive damages and/or for a new trial , and for such other and further relief as the Court deems to be just and proper.

Respectfully submitted,

Dated: December 10, 2024

/s/ Daniel A. Schnapp
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